

Benjamin J. Otto, ISB No. 8292
710 N. 6th Street
Idaho Conservation League
Boise, ID 83702
Phone: (208) 345-6933, x 12
Email: botto@idahoconservation.org

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2019 MAY 24 PM 1:14
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
AUTHORITY TO STUDY THE
MEASUREMENT INTERVAL
COMPENSATION STRUCTURE, AND
VALUE OF NET EXCESS ENERGY FOR ON-
SITE GENERATION UNDER SCHEDULE 84
AND TO TEMPORARILY SUSPEND
SCHEDULE 84 NET METERING SERVICE
TO NEW IDAHO APPLICANTS.

CASE NO. IPC-E-19-15
PETITION TO INTERVENE OF
VOTE SOLAR

Vote Solar petitions the Idaho Public Utilities Commission ("Commission") to intervene in this matter on behalf of itself and its members who are customers of Idaho Power Company ("Idaho Power") pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed in more detail below, Vote Solar has direct and substantial interests in these proceedings.

1. The name and address of Vote Solar is:

Vote Solar
360 22nd Street, Suite 730
Oakland, CA 94612
Phone: (415) 817-5060
Email: brian@votesolar.org

2. Vote Solar is a nonprofit organization working to foster economic opportunity, promote energy security, and fight climate change by making solar a mainstream energy resource. Vote Solar works at the state level across the country to support the policies and programs needed to bring solar to scale. Vote Solar seeks to promote the development of distributed generation solar resources, wholesale distributed generation, and large-scale solar. Vote Solar is working to implement, maintain, and enhance the policies necessary to build robust solar markets in key states, including Idaho. Vote Solar has over 100,000 members nationally including members in

Idaho Power's service territory. Vote Solar has a direct and substantial interest in this proceeding due to the impact to its members served by Idaho Power and to its role advocating for solar energy.

3. Vote Solar's intervention in this proceeding will not unduly broaden the issues or delay the proceeding because the interests of Vote Solar are directly related to the subjects addressed in the Idaho Power's application.

4. Vote Solar is represented in the proceeding by Benjamin J. Otto of the Idaho Conservation League with the expert assistance of Briana Kobor of Vote Solar. Vote Solar requests that all future pleadings, correspondence, discovery, and other documents be served on the following via electronic means:

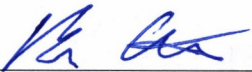
Benjamin J. Otto
Idaho Conservation League
710 N 6th St.
Boise, ID 83702
Phone: (208)345-3933 ext 12
Email: botto@idahoconservation.org

Briana Kobor
Vote Solar
358 S 700 E, Suite B206
Salt Lake City, UT 84102
Phone: (415) 817-5060
Email: briana@votesolar.org

5. Vote Solar intends to fully participate in this matter as a party. The nature and quality of Vote Solar's intervention in the proceeding is dependent on the nature and effect of other evidence in this proceeding. Vote Solar has not fully determined the specific positions it will take or the relief it will seek. Vote Solar seeks to intervene for purposes of protecting its interests as they arise. Vote Solar may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, Vote Solar respectfully requests the Commission grant this petition.

DATED this 24th day of May, 2019



Benjamin J. Otto (ISB No. 8292)
Idaho Conservation League

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 24th day of May 2019, served the foregoing **PETITION TO INTERVENE OF VOTE SOLAR** upon all parties of record in this proceeding, via the manner indicated:

Hand Delivery

Public Utilities Commission

Diane Hanian

Commission Secretary

Idaho Public Utilities Commission

472 West Washington Street

Boise, ID 83702

(Original and seven copies provided)



Benjamin J. Otto

Electronic Mail

Idaho Power

Lisa D. Nordstrom

Tim Tatum

Connie Aschenbrenner

Idaho Power Company

lnordstrom@idahopower.com

dockets@idahopower.com

ttatum@idahopower.com

caschenbrenner@idahopower.com

Russell Schiermeier

Russell Schiermeier

buyhay@gmail.com

Micron Technology

Austin Rueschhoff

Thorvald A. Nelson

Holland & Hart LLP

darueschhoff@hollandhart.com

tneIson@hollandhart.com

City of Boise

Abigail R. Germaine

Deputy City Attorney

BOISE CITY ATTORNEY'S OFFICE

agermaine@cityofboise.org

Jim Swier

Micron Technology, Inc.

jswier@micron.com

Idaho Clean Energy Association

Preston N. Carter

Givens Pursley LLP

prestoncarter@givenspursley.com

kendrah@givenspursley.com

Sierra Club

Kelsey Jae Nunez

Kelsey Jae Nunez LLC

kelsey@kelseyjaenunez.com

Idaho Irrigation Pumpers Association, Inc.

Eric L. Olsen

ECHO HAWK & OLSEN, PLLC

elo@echohawk.com

Zack Waterman

Mike Heckler

Idaho Siena Club

zack.waterman@sierraclub.org

michael.p.heckler@gmail.com

Anthony Yankel

tony@yankel.net